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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GOLDEN ENTERTAINMENT, INC.,
Plaintiff,

vs.

FACTORY MUTUAL INSURANCE
COMPANY,
Defendant.

Case No.: 2:21-cv-00969-APG-EJY

**STIPULATION TO CONTINUE (1) THE
FILING DATES FOR FACTORY MUTUAL
INSURANCE COMPANY’S MOTION TO
DISMISS AND CORRESPONDING
RESPONSES, AND (2) THE DEADLINE
FOR FACTORY MUTUAL INSURANCE
COMPANY TO PRODUCE CERTAIN
DOCUMENTS ORDERED BY THE COURT
(SECOND REQUEST)**

Inasmuch as defendant Factory Mutual Insurance Company (“FMIC”) has advised plaintiff Golden Entertainment, Inc. (“Golden”) that it needs additional time to complete its production of certain documents and associated privilege log(s) as ordered by the Court at the February 6, 2024 hearing on FMIC’s Motion for Protective Order (see ECF No. 106 (Transcript of Proceedings dated February 6, 2024 (held to be the Order of the Court) at 40-56), and the parties wish to work

1 cooperatively to schedule the production deadline so that it falls 21 days prior to the deadline for
2 FMIC to file a responsive pleading to Golden's Second Amended and Supplemental Complaint
3 ("SAC"), inasmuch as FMIC intends to file a motion to dismiss the SAC, and inasmuch as the
4 Court previously granted one extension at the parties' joint request (ECF No. 108), the parties, by
5 and through their respective counsel of record, hereby stipulate as follows:

6 WHEREAS, the current deadline for FMIC to complete its document production is April
7 23, 2024 (ECF No. 108 at 3);

8 WHEREAS, the current deadline for FMIC to file its renewed motion to dismiss is May 7,
9 2024 (*Id.*);

10 WHEREAS, the current deadline for Golden to file its response to FMIC's renewed motion
11 to dismiss is May 29, 2024 (*Id.*);

12 WHEREAS, the current deadline for FMIC to file its reply to Golden's response is June
13 12, 2024 (*Id.*);

14 WHEREAS, counsel for FMIC represents that it has been diligent in identifying, reviewing
15 and producing the documents ordered by the Court for production at the February 6, 2024 hearing,
16 but needs additional time to complete that production, including any associated privilege logs;

17 WHEREAS, the firm of Jones Turner, LLP, counsel for FMIC, consists of three attorneys,
18 only two of which are assigned to work on this case given the firm's workload and other pending
19 matters;

20 WHEREAS, at the February 6, 2024 hearing, the Court invited the parties to seek the
21 Court's assistance with any problems that might arise regarding the production (ECF No. 106 at
22 56);

23 WHEREAS, Golden and FMIC agree that it would be in the interests of the parties and this
24 Court to continue FMIC's production deadline by 30 days, up to and including May 23, 2024 and
25 to continue FMIC's filing date for its renewed motion to dismiss to June 13, 2024 (thus allowing
26 Golden time to review FMIC's completed production prior to filing of the renewed motion to
27 dismiss);

1 WHEREAS, Golden and FMIC agree that Golden may have four weeks to respond to
2 FMIC's renewed motion to dismiss; and

3 WHEREAS, this is the second stipulation for an extension of time to complete the
4 production of documents pursuant to the Court's February 6, 2024 ruling and the third stipulation
5 for an extension of time for FMIC to file its renewed motion to dismiss;

6 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties that:

- 7 1. FMIC's production of documents, and any associated privilege logs, pursuant to the
8 Court's March 18, 2024 Order (Doc. 108) shall be completed on or before **May 23,**
9 **2024;**
- 10 2. FMIC's new filing deadline for its renewed motion to dismiss is **June 13, 2024;**
- 11 3. Golden's response to such motion is due **July 11, 2024;** and
- 12 4. FMIC's reply is due on **July 25, 2024.**

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1 Dated: April 19, 2024

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11 Dated: April 19, 2024

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18
19 **IT IS SO ORDERED:**

20 
21 **UNITED STATES MAGISTRATE JUDGE**

22 **Dated: April 22, 2024**
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